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January 12, 2021

Project No. CF167-1906

Ms. Madi Novak
Remedial Project Manager, Superfund and Emergency Management Division
U.S. Environmental Protection Agency, Oregon Operations Office
805 SW Broadway, Suite 500
Portland, OR 97205-3331

Subject: **Q4 October 1–December 31, 2020 Quarterly Progress Report, Arkema Project Area**
Administrative Settlement Agreement and Order on Consent for Remedial Design at the River Mile 7 West Project Area
U.S. EPA Region 10 CERCLA Docket No. 10-2020-0054

Dear Ms. Novak:

On behalf of Legacy Site Services LLC (LSS), agent for Arkema Inc. (Arkema), this letter presents the quarterly progress report for work performed on the Arkema Project Area. This progress report is being submitted in accordance with Section 4.1 of Appendix A1, Arkema Statement of Work for the Administrative Settlement Agreement and Order on Consent for Remedial Design at the River Mile 7 West Project Area (CERCLA Docket No. 10-2020-0054) entered into by Arkema and the U.S. Environmental Protection Agency (EPA) with an effective date of February 21, 2020.

- a) Actions that have been taken toward achieving compliance with the Settlement:
- Submitted a table responding to EPA's comments on the draft Pre-design Investigation (PDI) Work Plan on October 27, 2020. The response to comment (RTC) table was submitted to EPA for approval prior to finalizing the PDI Work Plan, as requested by EPA during the September 30, 2020 meeting.
 - Received an email from EPA on November 9, 2020, responding to the RTC table with comments that should be taken into consideration in the PDI Work Plan.
 - Received an email message from EPA on November 10, 2020, providing the Sampling and Analysis Plan from the Newtown Creek Superfund Site that

includes a recommended shake test procedure and nonaqueous-phase liquid identification flow chart.

- EPA designated Madi Novak as the new EPA Project Coordinator on November 18, 2020.
 - Submitted the revised PDI Work Plan to EPA on December 18, 2020.
- b) List of all results of validated sampling, tests, and all other data received or generated by Respondent Arkema to comply with the Settlement:
- None.
- c) List of all deliverables that Respondent Arkema submitted to EPA:
- Draft PDI Work Plan (dated June 18, 2020).
 - PDI Work Plan (dated December 18, 2020).
- d) List of all activities scheduled for the next quarter:
- Receive and address any EPA comments on the PDI Work Plan.
 - Receive EPA approval of the PDI Work Plan.
 - Initiate planning of the PDI field sampling in accordance with the EPA-approved PDI Work Plan.
- e) Information regarding percentage of completion, unresolved delays encountered or anticipated that may affect the future schedule for implementation of the Arkema RD Work, and a description of efforts made to mitigate those delays or anticipated delays:
- None.
- f) List of any modifications to the work plans or other schedules that Respondent Arkema has proposed or that have been approved by EPA:
- LSS requested an extension of the due date for the PDI work plan until December 18, 2020, in an email message on November 13, 2020. The request was approved by EPA in an email message on November 13, 2020.
- g) List of all activities undertaken in support of the CIP during the reporting period and those to be undertaken in the next quarter:
- EPA has not requested any community involvement plan support for the Arkema Project Area.

Ms. Madi Novak
January 12, 2021
Page 3

Please contact me at (503) 943-3614 or Mike Pinto at (484) 437-1991 if you have any questions or comments pertaining to this progress report.

Sincerely,

A handwritten signature in black ink, appearing to read "Eron Dodak", is placed over a light gray rectangular background.

Eron Dodak, R.G.
Senior Consultant